

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

Motion GRANTED.
Plea hearing set for
8/14/13 at 3:00 p.m.

UNITED STATES OF AMERICA)
)
)
v.)
)
CLIFTON HAYES)

No. 3:13-00107
ALETA A. TRAUGER
Judge, U.S. District Court

**CLIFTON HAYES' UNOPPOSED MOTION TO ADVANCE
AND RESET HEARING FOR PLEA OF GUILTY**

COMES now, CLIFTON HAYES, through counsel, Assistant Federal Public Defender, Isaiah S. Gant, and moves this Honorable Court to enter an order advancing and resetting the plea date in this matter, presently scheduled for Tuesday, August 20, 2013, at 9:00 a.m., to any date the present week, except Thursday. In support of the foregoing motion, it is respectfully represented to this Honorable as follows:

1. Mr. Hayes, by way of Information is charged with being a felon in possession of a firearm in violation of 18 U. S. C. § 922 (g)(1). The matter is pending before this Court.
2. The parties have reached a plea agreement and therefore obviate the need for a trial on the merits.
3. The date for a change of plea hearing is presently scheduled for Tuesday, August 20, 2013, at 9:00 a.m.
4. Counsel for Mr. Hayes is scheduled to participate in a training program in Louisville, Kentucky, beginning Sunday, August 18 through Friday, August 23, 2013.
5. In order to avoid delay in the proceedings, and after consultation with counsel for the government, Assistant United States Attorney, Braden H. Boucek, counsel requests the Court to consider advancing and resetting the change of plea date to a date sometime this week (except Thursday, government counsel is unavailable that day), if the Court's calendar is subject to such an accommodation.